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SUPREME COURT  
STATE OF WASHINGTON  
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IN THE SUPREME COURT  
OF THE STATE OF WASHINGTON

CHAD M. CARLSEN, and  
SHASTA CARLSEN, husband  
and wife, individually and on  
behalf of a Class of similarly  
situated Washington families;  
and CARL POPHAM and  
MARY POPHAM, husband and  
wife, individually and on behalf  
of a Class of similarly situated  
Washington families,

Plaintiffs,

v.

GLOBAL CLIENT  
SOLUTIONS, LLC, an  
Oklahoma limited liability  
company; ROCKY MOUNTAIN  
BANK & TRUST, a Colorado  
financial institution; JOHN AND  
JANE DOES A-K,

Defendants.

No. 84855-6

*AMICUS CURIAE*  
NOTEWORLD LLC'S  
STATEMENT OF  
ADDITIONAL AUTHORITY

Pursuant to Washington Rule of Appellate Procedure 10.8, *amicus curiae* NoteWorld LLC ("NoteWorld") offers the following additional authority in response to Chief Justice Madsen's question at oral argument regarding whether NoteWorld could transfer funds held in the consumer's trust account to "Aunt Mary" at the direction of the consumer. Counsel

*AMICUS CURIAE* NOTEWORLD'S STATEMENT  
OF ADDITIONAL AUTHORITY - 1

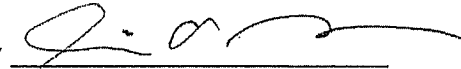
K&L GATES LLP  
925 FOURTH AVENUE  
SUITE 2900  
SEATTLE, WASHINGTON 98104-1158  
TELEPHONE: (206) 623-7580  
FACSIMILE: (206) 623-7022

for NoteWorld has confirmed that NoteWorld could transfer funds to Aunt Mary via check or wire transfer when directed by the consumer to do so.

RESPECTFULLY SUBMITTED this 17th day of March, 2011.

K&L GATES LLP

By



Paul J. Lawrence, WSBA # 13557

Todd L. Nunn, WSBA # 23267

Jessica A. Skelton, WSBA # 36748

Attorneys for Amicus Curiae

NoteWorld LLC

RECEIVED  
SUPREME COURT  
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Mar 17, 2011, 11:45 am  
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financial institution; JOHN AND  
JANE DOES A-K,

Defendants.

No. 84855-6

PROOF OF SERVICE

Bill Hill declares as follows:

I am and at all times hereinafter mentioned was a citizen of the  
United States, a resident of the State of Washington, over the age of 21  
years, competent to be a witness in the above action, and not a party

PROOF OF SERVICE- 1

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thereto; that on the 17th day of March, 2011, I caused to be served true  
copies of the following documents:

1. *Amicus Curiae* NoteWorld LLC's Statement of  
Additional Authorities; and
2. Proof of Service

upon:

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Matthew J. Zuchetto  
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Attorneys for *Amicus Curiae*  
Attorney General of Washington

I declare under penalty of perjury under the laws of the State of  
Washington that the foregoing is true and correct

DATED this 17th day of March, 2011.

By

*Bill Hill*

BILL HILL

## OFFICE RECEPTIONIST, CLERK

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Rec. 3-17-11

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**Subject:** Filing - Carlsen v. Global Client Solutions

Carlsen, et al. v. Global Client Solutions, et al.

Cause No. 84855-6

Filed by Jessica A. Skelton, WSBA #36748

Please file the attached documents:

Amicus Curiae Noteworld LLC's Statement of Additional Authority  
Proof of Service

Please let me know if you have any difficulty receiving either of these two documents. Thank you.

**Bill Hill, assistant to Jessica A. Skelton**

K&L Gates

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